

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo (SBN 144074)

dalekgalipo@yahoo.com

Cooper Alison-Mayne (SBN 343169)

cmayne@galipolaw.com

21800 Burbank Boulevard, Suite 310

Woodland Hills, CA 91367

Phone: (818) 347-3333

Attorneys for Plaintiff Dorothea Heimbach

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DOROTHEA HEIMBACH,

Plaintiff,

vs.

STANISLAUS COUNTY, JUSTIN
CAMARA, and ZA XIONG,

Defendants.

2:23-cv-01887-DJC-CSK

Assigned to:

District Judge Daniel J. Calabretta

**PLAINTIFFS' PROPOSED VOIR
DIRE QUESTIONS**

FPTC Date: December 18, 2025

Time: 1:30 PM

Location: Courtroom 7

1 PLEASE TAKE NOTICE that the Plaintiffs hereby submit their proposed
2 voir dire questions for the Court's consideration.

3 Respectfully submitted,
4
5

6 Dated: December 11, 2025

LAW OFFICES OF DALE K. GALIPO

7
8 By: /s/ Cooper Alison-Mayne
9 Dale K. Galipo
10 Cooper Alison-Mayne
11 *Attorneys for Plaintiff Dorothy Heimbach*
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

I. QUESTIONS RE: POLICE OFFICER BIAS

1. Would you be more likely to believe the testimony of a police officer over the testimony of somebody who is not a police officer?
2. Are you or any of your family members or close friends current or former government employees, police officers, or sheriff's deputies?
 - a. If yes, what agency and what type of job? How long?
3. Are you or any of your family members or close friends current or former service members in any division or branch of our military?
 - a. If yes, what division or branch and what type of job?
4. Have you or any of your family members or close friends attended or applied to attend any law enforcement academy or basic training?
5. Does anyone feel that police officers or sheriff's deputies have been unfairly portrayed in the media with respect to the use of force?

II. QUESTIONS RE: JUROR CONNECTION TO DEFENDANTS

6. Have you, a family member, or any of your close friends had any contact or association with the Stanislaus County Sheriff's Department, or any of their employees? If so, please describe the circumstances of the contact or association.
 - a) If so, would you view the evidence in this case differently because of these past experiences?

III. QUESTIONS RE: JUSTICIABILITY OF POLICE OFFICER CONDUCT

7. Do you think that our society should hold police officers liable in court when they violate an individual's constitutional rights?

- 1 8. Do you agree that police officers or the entity they work for should pay
2 money damages when they violate an individual's constitutional rights?
3 9. Do you think that police officers should be able to use as much force as they
4 want when arresting someone?
5 10. Do you think that our society should restrict the amount of force that police
6 officers can use?
7

8 **IV. QUESTIONS RE: GENERAL JUROR BIAS & BIAS AGAINST**
9 **ACTIONS FOR MONEY DAMAGES**

- 10 11. Would it be difficult for you to award substantial damages if the evidence
11 and law supported it?
12 12. Do you think that because the defendants are denying responsibility for this
13 incident, they are probably not responsible?
14 13. Is there anybody that would hold it against the plaintiffs simply because they
15 have pursued this case to trial?
16

17 **V. QUESTIONS RE: BIAS AGAINST PEOPLE WHO USE**
18 **METHAMPHETAMINE**

- 19 14. Have you, a family member, or a close friend had any experience with
20 someone who uses or has used methamphetamine? If so, please describe.
21 15. Do you believe that a person's methamphetamine use makes them less
22 deserving of protection under the law?

23 **VI. QUESTIONS RE: BIAS AGAINST PEOPLE EXPERIENCING**
24 **HOMELESSNESS**

- 25 16. Have you, a family member, or a close friend had any experiences, positive
26 or negative, with someone who was homeless or unhoused? If so, please
27 describe.
28

1 17. Would the fact that someone was homeless at the time of an incident affect
2 your ability to view them as a person entitled to the same rights as anyone
3 else?

4 18. Do you believe that a person's housing status should have any impact on
5 whether police officers treat them with dignity and respect?

6 **VII. QUESTIONS RE: BIAS AGAINST PEOPLE WITH MENTAL**
7 **HEALTH ISSUES**

8 19. Have you, a family member, or a close friend ever experienced a mental
9 health condition? If so, please describe.

10 20. Do you believe that people with mental health conditions are more likely to
11 be violent?

12 21. Do you believe that a mental health condition makes a person less credible
13 or less deserving of protection under the law?

14 22. Would learning that a person involved in this case had a mental health
15 condition affect your ability to evaluate the facts fairly and without bias?